

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISIONROBERT BERRY, INDIVIDUALLY
AND ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiff,

§ Civil Action No. No. 3:17-cv-00304-JFA

VS.

WELLS FARGO & COMPANY,
WELLS FARGO CLEARING
SERVICES, LLC, and WELLS FARGO
ADVISORS FINANCIAL NETWORK,
LLC, and DOES 1 thru 50,

Defendants.

§

**JOINT MOTION TO EXTEND TIME TO FILE RESPONSES
TO OBJECTIONS TO CLASS ACTION SETTLEMENT**

Plaintiff Robert F. Berry (“Plaintiff”) and Defendants Wells Fargo & Company, Wells Fargo Clearing Services, LLC f/k/a Wells Fargo Advisors, LLC, and Wells Fargo Advisors Financial Network, LLC (together, the “Parties”) jointly move the Court to extend the deadline for their responses to the Objections to the Class Action Settlement by fourteen days from June 8, 2020 to June 22, 2020. In support of this request, the Parties state as follows:

1. On May 13, 2020, Vicky L. Bayley (“Bayley”) filed a response in opposition to Plaintiff’s Motion for Final Approval of the Class Action settlement, setting forth her objections to the proposed settlement. (ECF No. 119.) Additional objections were served on May 14, 2020

by a group of five individual who labeled themselves the Stoltmann Objectors, followed by two more filed on May 15, 2020 by Dean Zack (ECF No. 143) and Scott D. Burns (ECF No. 144).¹

2. At the time these objections were filed and/or served, the Fairness Hearing was set for June 15, 2020, and any responses to the objections were due June 8, 2020. (ECF No. 118 at ¶¶ 4, 13.)

3. Following a hearing held June 1, 2020, the Court rescheduled the Fairness Hearing for July 13, 2020. (ECF No. 158.)

4. At the June 1, 2020 hearing, the Court raised several additional issues that it would like the Parties to address. Therefore, the Parties require additional time to evaluate and determine their response to the Objections and the additional issues raised by the Court.

5. This request is made in good faith and not for the purpose of unwarranted delay or any other improper purpose. The Parties do not believe that this extension, if granted, would affect any other case deadlines.

6. For these reasons, the Parties jointly request that the Court enter the proposed schedule: any response to Objections to the Class Action Settlement shall be filed with the Court and served on opposing counsel by **June 22, 2020**.

Accordingly, the Parties respectfully request that the Court extend the deadline for their responses to Objections to the Class Action Settlement.

DATED: June 2, 2020

Respectfully submitted,

By: /s/ William S. Norton
 William S. Norton (D.S.C 11343)
 Erin C. Williams (D.S.C. 12282)

By: /s/ Adam N. Yount
 Adam N. Yount (10313)
 Robert Y. Knowlton
 Pierce T. MacLennan

¹ Burns has since withdrawn his objection. (ECF No. 145.) Another class member, Jerry Cross, served an objection to Class Counsel's request for attorneys' fees, but has not otherwise challenged the settlement.

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